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**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RONNIE G. WIGGINS,	:	CIVIL NO. 3:11-CV-1298
Plaintiff,	:	
	:	(Judge Munley)
v.	:	
	:	
BRIAN A. BLEDSOE, <u>et al.</u>,	:	
Defendants.	:	Filed Electronically

**MOTION FOR LEAVE TO DEPOSE PLAINTIFF WIGGINS
PURSUANT TO FED. R. CIV. P. 30(a)(2)**

NOW COMES the United States of America, by and through its counsel, Peter J. Smith, United States Attorney for the Middle District of Pennsylvania, and Timothy Judge, Assistant United States Attorney, who hereby moves the Court for leave to take the deposition of Plaintiff Ronnie G. Wiggins pursuant to Fed. R. Civ. P. 30(a)(2) as he is confined in prison. The parties have agreed to take the deposition at USP McCreary in Kentucky on January 15, 2013. The deposition of the Plaintiff is necessary to appropriately prepare a defense to his claims. Additionally, no brief is being submitted pursuant to Local Rule 7.5(b) because the reasons for the motion are set forth in this motion and all parties concur.

Wherefore, Defendants respectfully request the Court grant the instant motion.

Respectfully submitted,

PETER J. SMITH
United States Attorney

s/Timothy Judge
TIMOTHY JUDGE
Assistant U.S. Attorney
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Date: December 20, 2012

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on December 20, 2012, she served a copy of the attached

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via the Court's electronic case filing system to:

Christine C. Levin
David John Stanoch
Francis J. Dermody, III
Jennifer L. Burdick
Sean P. McConnell
Stephen D. Brown

s/ Kimberly A. Stevens
Paralegal Specialist